

### **REMARKS**

This is a full and timely response to the outstanding Action mailed April 20, 2004. Applicant notes that there was a discrepancy with respect to the finality of the Office Action. In this regard, the checkbox was checked on the summary sheet indicating that the Office Action was FINAL. However, the required designation was not made within the Office Action itself regarding a status of Final. Therefore, the undersigned has treated this Office Action as being non-FINAL.

Upon entry of the amendments in this response, claims 1 – 5 and 11 – 31 remain pending. In particular, Applicant has amended claims 2, 5, 11, 14, 19, 20, 22-24 and 26-31, and have canceled claims 6 - 10 without prejudice, waiver, or disclaimer. Applicant has canceled claims 6 - 10 merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicant reserves the right to pursue the subject matter of these canceled claims in a continuing application, if Applicant so chooses, and does not intend to dedicate the canceled subject matter to the public. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

### **Indication of Allowable Subject Matter**

Applicant appreciates the Examiner's indication of allowable claims. Specifically, the Office Action indicates that claims 1 – 5, 16-19 and 24 - 31 are allowed over the prior art of record. Applicant notes, however, that the material recited as the stress relief layer is erroneously cited as "polysilicon" instead of "polyimide" in claims 24 - 31. In order to correct the typographical errors, Applicant has amended claims 24 - 31 by replacing "polysilicon" with

“polyimide.” As will be described in detail below, Applicant respectfully asserts that these amended claims are in condition for allowance.

### **Rejections under 35 U.S.C. 112**

The Office Action indicates that claims 11-15 and 20-23 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant respectfully traverses the rejection.

In particular, Claims 11 and 20 have been amended by deleting “said semiconductor surface comprising at least one completed semiconductor device, said at least one completed semiconductor device being densely packed and having a relatively large surface area,” as indicated by the Examiner. In view of the above, Applicant respectfully submits that the rejection has been accommodated and respectfully requests that the rejection be withdrawn.

### **Rejections under 35 U.S.C. §102**

The Office Action indicates that Claims 11-14 and 20-22 stand rejected under 35 U.S.C. 102(e) as being anticipated by Wu (U.S. Patent 6489237 B1). Applicant respectfully traverses the rejection for at least the reasons discussed below.

With respect to claim 11, that claim recites:

**Claim 11** A method for applying a stress relief interface layer over a semiconductor surface, comprising the steps of:  
providing a semiconductor surface;  
*depositing a stress relief interface layer over said semiconductor surface*; and  
creating at least one opening through said stress relief interface layer.

*(Emphasis Added).*

Applicant respectfully asserts that the cited art is legally deficient for the purpose of anticipating claim 11, because at least the features/limitations emphasized above in claim 11 are not taught or otherwise disclosed by any of the references. Specifically, claim 11 recites depositing a stress relief interface layer over said semiconductor surface. To the contrary, Wu teaches a **conductive layer**, such as metal, polysilicon, or amorphous silicon, deposited over a semiconductor surface, instead of a stress relief interface layer. Accordingly, Wu does not teach or suggest the use of presently claimed “a stress relief interface layer”. Since Wu does not teach or suggest all the limitations of amended claim 11, Applicant respectfully asserts that the rejection is improper and should be removed. Therefore, Applicant respectfully asserts that claim 11 and dependent claim 12-15, which depend from claim 11, are in condition for allowance.

With respect to claim 20, that claim recites:

**Claim 20** A method for applying a stress relief interface layer over a semiconductor surface, comprising the steps of:

providing a semiconductor surface;  
*depositing a layer of polyimide over said semiconductor surface;* and  
creating at least one opening through *the layer of polyimide.*

*(Emphasis Added).*

Applicant respectfully asserts that the cited art is legally deficient for the purpose of anticipating claim 20, because at least the features/limitations emphasized above in claim 11 are not taught or otherwise disclosed by any of the references. Specifically, claim 20 recites depositing a layer of polyimide over said semiconductor surface, and creating at least one opening through the layer of polyimide. To the contrary, Wu teaches a **conductive layer**, such as

metal, polysilicon, or amorphous silicon, deposited over a semiconductor surface. Thus, Wu teaches neither depositing **a layer of polyimide** over a semiconductor surface, nor creating at least one opening through **the layer of polyimide**. Since Wu fails to teach or suggest all the limitations of amended claim 20, Applicant respectfully asserts that claim 20 is in condition for allowance. Since Claims 21-23 depend from and incorporate all the features/limitations of claim 20, Applicant also asserts that these claims are in condition for allowance.

As mentioned above, Applicant has amended independent claims 24, 27 and 30 to correct typographical errors. Applicant respectfully asserts that claims 24, 27 and 30 and their respective dependent claims 25 – 26, 28 – 29 and 31 are in condition for allowance because the cited art, either individually or in combination, does not teach or reasonably suggest at least the features/limitations emphasized below in the respective dependent claims.

**Claim 24** A method for applying a stress relief interface layer over a semiconductor surface, comprising the steps of:  
providing a semiconductor surface;  
***depositing a layer of polyimide over the surface of said semiconductor surface;***  
***creating at least one opening through said layer of polyimide;*** and  
depositing a layer of mold compound over the surface of said layer of polyimide, filling said at least one opening created through said layer of polyimide.

*(Emphasis Added).*

**Claim 27** A method for applying a stress relief interface layer over a semiconductor surface, comprising the steps of:  
providing a semiconductor device;  
***depositing a layer of polyimide over a surface of said semiconductor device;*** and  
***creating at least one opening through the layer of polyimide.***

*(Emphasis Added).*

**Claim 30** A method for applying a stress relief interface layer over a semiconductor surface, comprising the steps of:

providing a semiconductor device;

***depositing a layer of polyimide over a surface of said semiconductor device;***

***creating at least one opening through said layer of polyimide;*** and

depositing a layer of said compound over the surface of said layer of polyimide, filling said at least one opening created through said layer of polyimide.

*(Emphasis Added).*

As described above, Wu teaches neither depositing **a layer of polyimide** over a semiconductor surface, nor creating at least one opening through **the polyimide**. Therefore, Applicant respectfully asserts that claims 24, 27 and 30 and their respective dependent claims 25 – 26, 28 – 29 and 31 are in condition for allowance.

#### **Cited Art Made of Record**

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

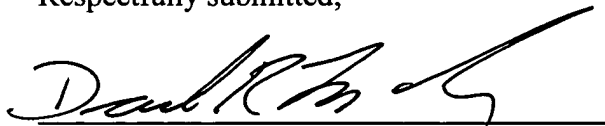
#### **CONCLUSION**

In light of the foregoing amendments and for at least the reasons set forth above, Applicant respectfully submits that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims 1 – 5 and 11 – 31 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic

conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

No fee is believed to be due in connection with this amendment and response to Office Action. If, however, any fee is believed to be due, you are hereby authorized to charge any such fee to deposit account No. 20-0778.

Respectfully submitted,

  
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